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April 10, 2002

Magalie Roman-Salas
Secretary
Federal Communications Commission
445 12 St., S.W.
Washington, D.C. 20554

**Re: Ex Parte, Telecommunications Relay Services and Speech-to-Speech Services
For Individuals With Hearing And Speech Disabilities, CC Docket No. 98-67**

Dear Ms Salas:

Yesterday, Larry Fenster, Hadi Alsegaf, Bill McClelland, Alana Beal, Beth Schreiber from WorldCom, and Ruth Milkman from Lawler, Metzger, and Milkman, met with Dan Gonzales from Commissioner Martin's Office to discuss WorldCom's Petition to obtain reimbursement for its Internet Protocol Relay Service ("IP-Relay Service") from the Interstate TRS Fund. In addition to demonstrating the features of WorldCom's IP-Relay service, we also discussed the Commission's authority to: 1) approve a relay service where the call originates from the Internet, and 2) to approve reimbursement solely from the Interstate TRS Fund.

We explained that the Commission derives its authority to regulate relay service from Title IV of the Americans With Disabilities Act, which defines telecommunications relay service to "...include services that enable two-way communication between an individual who uses a TDD or other nonvoice terminal device and an individual who does not use such a device." We explained that the Commission had authority to regulate any service that fit this definition of relay service, even if the service might *also* fit the definition of a telecommunications service, an information service, or a hybrid service.

We also explained that Section 225(d)(3) gave the Commission authority to reimburse relay providers solely from the Interstate Fund when a State either did not have a federally-certified relay program, or was unable to reimburse relay providers from a state's TRS fund. We explained that the lack of originating ANI, and the inability of state relay administrator to reimburse carriers that had not been awarded a contract to provide relay service in the state, trigger the Commission's 225(d)(3) authority to reimburse IP-Relay solely from the Interstate TRS Fund.

If you have any questions, please contact me at the telephone number above.

Sincerely,

Larry Fenster

Larry Fenster

cc: Dan Gonzales
Margaret Egler
Pam Gregory